

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

TZVI WEISS, <i>et al.</i> ,	:	
	:	
Plaintiffs,	:	
	:	Case No. 05-cv-4622 (DLI)(RML)
-against-	:	
	:	
NATIONAL WESTMINSTER BANK, PLC,	:	
	:	
Defendant.	:	
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NATAN APPLEBAUM, <i>et al.</i> ,	:	
	:	
Plaintiffs,	:	
	:	Case No. 07-cv-916 (DLI)(RML)
-against-	:	
	:	
NATIONAL WESTMINSTER BANK, PLC,	:	
	:	
Defendant.	:	
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DECLARATION OF AARON SCHLANGER

Aaron Schlanger declares as follows:

1. I am a member of the Bar of this Court and am counsel at Osen LLC, counsel for the *Weiss* Plaintiffs. I submit this declaration and exhibits attached hereto on behalf of all Plaintiffs in support of Plaintiffs' Opposition to Defendant National Westminster Bank Plc's Motion for Summary Judgment.
2. Attached hereto as **Exhibit 1** is a true and correct copy of Plaintiffs' January 30, 2012 Statement of Material Facts as to Which There Is a Genuine Issue to Be Tried Pursuant to Local Civil Rule 56.1(b).

3. Attached hereto as **Exhibit 2** is a true and correct copy of W_S171980-87 – a Settlement Agreement between the U.S. Department of the Treasury’s Office of Foreign Assets Control and the Royal Bank of Scotland plc.

4. Attached hereto as **Exhibit 3** is a true and correct copy of W_S171818-23 – a Consent Order between the New York State Department of Financial Services and the Royal Bank of Scotland plc.

5. Attached hereto as **Exhibit 4** is a true and correct copy of the U.S. Treasury Department Press Release announcing the designation of Interpal and four other charities that fund Hamas as Specially Designated Global Terrorists (“SDGT”).

6. Attached hereto as **Exhibit 5** is a true and correct copy of NW191806 – the *Financial Times* article titled “Palestinian charity in UK under attack,” dated March 13, 1996.

7. Attached hereto as **Exhibit 6** is a true and correct copy of W_S157786-87 – *The Guardian* article titled “Close Trust, Israel Pleads; Britain is being asked to clamp down on Palestinian fundraisers,” dated August 7, 1997.

8. Attached hereto as **Exhibit 7** is a true and correct copy of W_S166810-12 – *The Sunday Times* article titled “The PLO flag was trampled in the dust as a symbol of surrender,” dated September 5, 1993.

9. Attached hereto as **Exhibit 8** is a true and correct copy of W_S171894-909 – *The New York Times* article titled “In Gaza, Peace Meets Pathology,” dated November 27, 1994.

10. Attached hereto as **Exhibit 9** is a true and correct copy of the U.S. Treasury Department Press Release announcing the designation of the Union of Good as an SDGT.

11. Attached hereto as **Exhibit 10** is a true and correct copy of NW013415.

12. Attached hereto as **Exhibit 11** is a true and correct copy of selected pages from the Expert Report of Dr. Matthew Levitt.

13. Attached hereto as **Exhibit 12** is a true and correct copy of W_S172139 with a certified translation from the *Linde v. Arab Bank* trial – a video from an Al Jazeera television broadcast of a conference in which Sheikh Yusuf Qaradawi and Hamas political leader Khalid Mashaal are seated next to each other.

14. Attached hereto as **Exhibit 13** is a true and correct copy of the U.S. Treasury Department Press Release announcing the designation of the Holy Land Foundation for Relief and Development as an SDGT.

15. Attached hereto as **Exhibit 14** is a true and correct copy of the U.S. Treasury Department Press Release announcing the designation of the Al-Aqsa Foundation as an SDGT.

16. Attached hereto as **Exhibit 15** is a true and correct copy of Exhibit A to the Supplemental Expert Report of Wayne D. Geisser dated December 28, 2010.

17. Attached hereto as **Exhibit 16** is a true and correct copy of Exhibit D to the Supplemental Expert Report of Wayne D. Geisser dated December 28, 2010.

18. Attached hereto as **Exhibit 17** is a true and correct copy of W_S130475-96.

19. Attached hereto as **Exhibit 18** is a true and correct copy of the May 29, 2003 Bank of England News Release announcing the freezing the Al-Aqsa Foundation's funds.

20. Attached hereto as **Exhibit 19** is a true and correct copy of W_S052106-9 with an English language translation – a list of martyrs maintained by the Al-Tadamun Charitable Society – Nablus for the Union of Good.

21. Attached hereto as **Exhibit 20** is a true and correct copy of W_S057507-13 – a file maintained by the Al-Tadamun Charitable Society-Nablus with respect to Ayman Halawa.

22. Attached hereto as **Exhibit 21** is a true and correct copy of selected pages from the Expert Report of Arie Spitz.

23. Attached hereto as **Exhibit 22** is a true and correct copy of Exhibit C to the Expert Report of Wayne D. Geisser dated November 19, 2009.

24. Attached hereto as **Exhibit 23** is a true and correct copy of W_S156203 with a certified translation from the *Linde v. Arab Bank* trial – a video from the Hezbollah-affiliated Al Manar television station broadcasting a presentation by a kindergarten class.

25. Attached hereto as **Exhibit 24** is a true and correct copy of W_S098071 with a certified translation from the *Linde v. Arab Bank* trial – a video titled “Dirty War.”

26. Attached hereto as **Exhibit 25** is a true and correct copy of NW212124 – a letter from Michael Hoseason to the National Criminal Intelligence Service.

27. Attached hereto as **Exhibit 26** is a true and correct copy of the website <http://cryptome.org/za-hamas.htm> - a briefing document prepared by the South African National Intelligence Agency.

28. Attached hereto as **Exhibit 27** is a true and correct copy of NW052056-66.

29. Attached hereto as **Exhibit 28** is a true and correct copy of NW052074-91.

30. Attached hereto as **Exhibit 29** is a true and correct copy of NW191801-6.

31. Attached hereto as **Exhibit 30** is a true and correct copy of the testimony of Stuart A. Levey, Treasury Department Under Secretary for Terrorism and Financial Intelligence, dated August 23, 2004.

32. Attached hereto as **Exhibit 31** is a true and correct copy of excerpts from the July 23, 2010 deposition of Amanda Holt.

I declare under penalty of perjury that the foregoing is true and correct. Executed in
Hackensack, New Jersey on May 8, 2018.

/s/ Aaron Schlanger